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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ALEXANDRA RASEY-SMITH, et al..

**Case No.** 2:24-cv-03265-MWC-SSC

## Plaintiffs,

vs.

CITY OF LOS ANGELES, et al.,

## Defendants.

**DECLARATION OF ERIC  
VALENZUELA IN SUPPORT OF  
PLAINTIFFS' MOTION TO AMEND  
THE COMPLAINT/MODIFY THE  
SCHEDULING ORDER**

1                   **DECLARATION OF ERIC VALENZUELA**

2                   I, Eric Valenzuela, declare and state as follows:

3                   1. I am an attorney duly licensed to practice law before this Court and I  
4 am one of the attorneys of record for the Plaintiffs in the instant action.

5                   2. I am personally familiar with the facts contained herein and would and  
6 could competently testify thereto if called upon to do so.

7                   3. I am filing this Declaration in support of Plaintiffs motion to Amend  
8 the Complaint/Modify the Scheduling Order.

9                   4. Defendants' Responses to Plaintiffs' Request for Production of  
10 Documents did not contain any of the investigation materials regarding the shooting,  
11 including the Force Investigation Division Report, and the recorded interviews of  
12 the involved officers.

13                  5. Attached hereto as **Exhibit "A"** is a true and correct copy of the  
14 January 13, 2025, Email from Defense Counsel to Plaintiffs' Counsel.

15                  6. Defendants' discovery responses contained almost 1,500 documents,  
16 none of which clearly identified the name of the shooting officer.

17                  7. After recently reviewing these documents again, I discovered one line  
18 in one of the reports which indicated that Officer Caleb Garcia Alamilla was  
19 monitored after his OIS (officer involved shooting).

20                  8. Many of the other reports also make mention of all involved officers  
21 being monitored after the OIS.

22                  9. Attached hereto as **Exhibit "B"** is a true and correct copy of the Watch  
23 Commander's Daily Report.

24                  10. Attached hereto as **Exhibit "C"** is a true and correct copy of the  
25 January 2, 2025, Email that I sent to Defense Counsel.

26                  11. Attached hereto as **Exhibit "D"** is a true and correct copy of the Email  
27 that I sent to Defense Counsel.

1           12. Attached hereto as **Exhibit “E”** is a true and correct copy of the  
2 January 13, 2025, Email from Defense Counsel to Plaintiffs’ Counsel.

3       13. Our office routinely stipulates with the City Attorney's Office to amend  
4 the complaint to add the shooting officer in these types of cases.

5 14. Attached hereto as **Exhibit “F”** is a true and correct copy of the  
6 December 20, 2024, Email from Defense Counsel to Plaintiffs’ Counsel.

I declare under penalty of perjury under the law of the United States of America that the forgoing is true and correct.

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11 | DATED: January 14, 2025

/s/ Eric Valenzuela

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